## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JUDTIH ANN HOLLENBECK : CHAPTER 13

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

.

VS.

:

JUDITH ANN HOLLENBECK

Respondent(s) : CASE NO. 4-19-bk-01850

## TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 1st day of July, 2019, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. Plan ambiguous
    - (1) Payment
    - (2) 2(D)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

## **CERTIFICATE OF SERVICE**

AND NOW, this 12th day of July, 2019, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Norman Lubin, Esquire 33 West 3<sup>rd</sup> Street Corestate Plaza, Suite 202 Williamsport, PA 17701

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee